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**JUDGE'S COPY****IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA****FILED  
HARRISBURG**

OCT 20 2000

MARY E. D'ANDREA, CLERK  
Per [Signature]  
DEPUTY CLERK**CHARLES ISELEY,****Plaintiff****v.****W. CONWAY BUSHEY, et al.,****Defendants****No. 1:00-CV-0577  
(Judge Kane)****MOTION FOR EXTENSION OF TIME  
TO RESPOND TO PLAINTIFF'S MOTION  
FOR A TEMPORARY RESTRAINING ORDER**

Defendants respectfully request the Court to permit them a seven day extension of time to file their memorandum opposing plaintiff's motion for a temporary restraining order. In support of this motion, defendants state as follows:

1. On October 17, 2000, counsel for defendants received a Motion for Temporary Restraining Order in the above-captioned case. Plaintiff's Certificate of Service, as well as the motion and brief, were dated October 5, 2000. The envelope in which the motion was contained was postmarked October 11, 2000. See Exhibit "A" attached.

2. If plaintiff did indeed place the Motion and Brief in the appropriate mail box, defendants' response to the motion would be due on October 23, 2000.

3. Due to other litigation duties and responsibilities, counsel does not believe she can realistically investigate and submit her response and supporting documents by October 23, 2000.

4. On October 16, 2000, undersigned counsel received a Motion for A Preliminary Injunction dated October 9, 2000 in Robin v. Horn, et al., No. 3:CV-99-1841. Her response to that Motion is due on October 26, 2000.

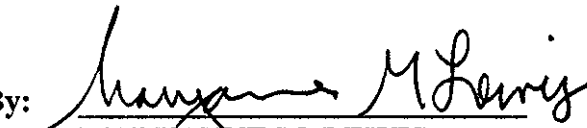
5. In addition, undersigned counsel has a motion for summary judgment and supporting brief due on October 24, 2000 in Watson v. Pennsylvania Board of Probation and Parole, et al., No. 3:CV-99-1344.

6. A brief extension of just seven (7) days will be adequate to complete the filing for presentation to the Court.

**WHEREFORE**, the defendants respectfully requests that the time for filing their response to the motion for temporary restraining order be extended to October 30, 2000.

Respectfully submitted,

**D. MICHAEL FISHER**  
Attorney General

By:   
**MARYANNE M. LEWIS**  
Deputy Attorney General

**SUSAN J. FORNEY**  
Chief Deputy Attorney General  
Chief, Litigation Section

Office of Attorney General  
15<sup>th</sup> Flr., Strawberry Sq.  
Harrisburg, PA 17120  
FAX: (717) 772-4526  
Direct Dial: (717) 787-9719  
DATE: October 20, 2000

**EXHIBIT "A"**

IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF PENNSYLVANIA

CHARLES ISELEY

Plaintiff,

v.

W. CONWAY BUSHEY, et al.,  
Defendants.

Civil Action No.

1:00-CV-00577

MOTION FOR TEMPORARY RESTRAINING ORDER

Comes the plaintiff, Charles Iseley, and respectfully requests  
the court for a temporary restraining order to be issued against the  
defendants to bar them from continuing to utilize false information contained  
in plaintiff's records against him for the reasons set forth in the  
accompanying brief in support of this motion.

Dated: October 5, 2000

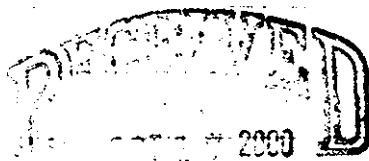
Respectfully submitted,

Charles Iseley

Charles Iseley

Am. 1125, 1 Kelley Dr

Coal Township, PA 17866



OFFICE OF THE CLERK GENERAL  
LITIGATION SECTION

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

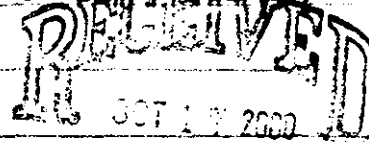
CHARLES ISELEY,  
Plaintiff,

v.

W. CONWAY BUSHEY, et al,  
Defendants

Civil Action No.

1:00-CV-00577



OFFICE OF ATTORNEY GENERAL  
LITIGATION SECTION

BRIEF IN SUPPORT OF MOTION FOR TEMPORARY RESTRAINING ORDER

The complaint specifically avers that there is false/inaccurate data in plaintiff's prison/parole records and that said data has and is being used to keep him wrongfully in prison.

One primary and blatant example of this is that plaintiff's maximum sentence expired approximately on July 21, 2000, and yet he remains in the hole in a maximum security prison (plaintiff is currently in the hole at Graterford prison).

The defendants have utterly refused to correct the false/inaccurate information in plaintiff's files to keep him in prison. This is documented in the attached declaration. Such deliberate and intentional actions against plaintiff is a clear violation of his constitutional rights.

Conclusion

Wherefore, the court should issue an order forthwith for a hearing to establish why a TRO should not be issued to correct the inaccurate/false data/files/records.

Date: October 5, 2000

Respectfully submitted  
Charles Iseley  
Charles Iseley, Esq.  
K. Kelley, Esq.  
Am. 0300

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

CHARLES ISELEY,

Plaintiff,

v

Civil Action No.

1:00-CV-00577

RONALD BUSHLEY, et al.,  
Defendants

DECLARATION

I, Charles Iseley, hereby declare under penalty of perjury that the following  
true and correct:

1. On November 7, 1983, I received six prison sentences.
2. Five of the sentences (Four 7 1/2-15 years and a 1-2 year) were run concurrent  
an aggregate sentence of 7 1/2-15 years. The sentence began on January 21, 1983,  
initially.
3. The sixth sentence was a 5-10 year sentence which was to be served  
concurrent to the aforementioned 7 1/2-15 year sentence.
4. The sixth sentence was to begin at the minimum expiration of the  
15 year sentence which occurred in 1990. This is clearly and easily verified  
perusal of the Bucks County Sentence Sheet which was filled out and signed  
by the sentencing judge.
5. The Defendants allege that my minimum sentence expiration is in 2008.
6. However, it is a fact that it was approximately on July 21, 2000, and  
for years they have refused to acknowledge this despite my numerous com-  
munications requesting them to do so.
7. I am being held in prison illegally.

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

CHARLES ISELEY,  
Plaintiff,

v.

W. CONWAY BUSHLEY, et al.,  
Defendants

Civil Action No.

1:00-CV-00577

CERTIFICATE OF SERVICE

I hereby certify that I caused to be served the foregoing motion for Temporary Restraining Order, brief in support of same and Declaration by mailing copies of same to:

Maryanne Lewis, dep. atty. gen.

C. P.ice of Atty Gen.

15th Floor, Strawberry Sq

Harrisburg, PA 17180

Date: October 5, 2000

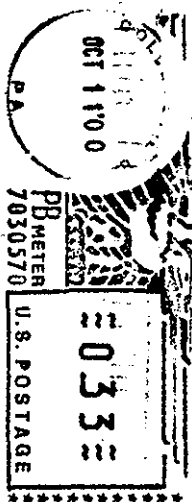
Charles Iseley  
Charles Iseley

*Charles Isley, AM-9320*  
Box 244  
Greensburg, PA 19426-0244

*Maryanne Lewis, deputy gen.  
Office of Atty. Gen.  
15th Floor, Strawberry St.  
Harrisburg, PA 17100*

**RECEIVED**  
OCT 17 2000  
OFFICE OF ATTORNEY GENERAL  
LITIGATION SECTION

UNMAYE MAIL  
PA - DEPT OF CONSTITUTION







CHESAPEAKE 2000  
A PARTNERSHIP FOR  
THE BAY'S FUTURE  
JUNE 2000



IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

CHARLES ISELEY,

Plaintiff

v.

W. CONWAY BUSHEY, et al.,

Defendants

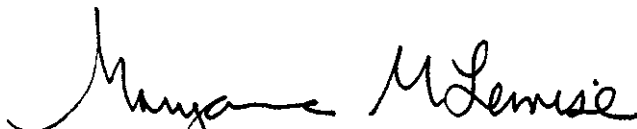
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No. 1:00-CV-0577  
(Judge Kane)

CERTIFICATE OF SERVICE

I, Maryanne M. Lewis, Deputy Attorney General, hereby certify that on this date I caused to be served the foregoing Motion for Extension of Time to Respond to Plaintiff's Motion for a Temporary Restraining Order, by depositing a copy of the same in the United States mail, postage prepaid, in Harrisburg, PA., addressed to the following:

Charles Iseley, #AM-9320  
SCI-Coal Township  
1 Kelley Drive  
Coal Township, PA 17866-1020



MARYANNE M. LEWIS  
DEPUTY ATTORNEY GENERAL

DATE: October 20, 2000